

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,  
ELECTRICAL WORKERS' HEALTH AND  
WELFARE FUND, LOCAL 103, I.B.E.W.;  
ELECTRICAL WORKERS' PENSION FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
SUPPLEMENTARY HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' DEFERRED INCOME FUND,  
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'  
JOINT APPRENTICESHIP AND TRAINING  
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL  
WORKERS' EDUCATIONAL AND CULTURAL  
FUND; ANTHONY J. SALAMONE, as he is  
ADMINISTRATOR, NATIONAL ELECTRICAL  
BENEFIT FUND; and LOCAL 103, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL WORKERS,  
Plaintiffs

vs.

CHRIS MEALEY ELECTRICAL, INC.,  
Defendant

and

FIRST TRADE UNION BANK and FLEET BANK,  
Trustees

C.A. No. 04-12209 EFH

**PLAINTIFFS' MOTION FOR FINDING OF CIVIL  
CONTEMPT AND ISSUANCE OF A CAPIAS**

Plaintiffs, Russell F. Sheehan, as he is Administrator, et al ("Funds"), move this honorable Court for an order issuing a capias to place the president of Defendant Chris Mealey Electrical, Inc. in custody until such time as he complies with this Court's April 11, 2005 Order for Preliminary Injunction and its October 19, 2005 Order.

In support of their Motion, Plaintiffs submit herewith their Memorandum of Law In Support of Plaintiffs' Motion Finding of Civil Contempt and Issuance of a Capias.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is  
ADMINISTRATOR, ELECTRICAL  
WORKERS' HEALTH AND WELFARE  
FUND, LOCAL 103, I.B.E.W., et al,

By their attorneys,

/s/ Gregory A. Geiman  
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Gregory A. Geiman, Esquire  
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Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: December 19, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been served by first class mail upon defendant Chris Mealey Electrical, Inc. at 90 Wilkins Road, Braintree, MA 02184 this 19<sup>th</sup> day of December, 2005.

/s/ Gregory A. Geiman  
Gregory A. Geiman, Esquire